

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
)	Bankruptcy Case
UNIMEX CORPORATION,)	No. 20-12535-BFK
)	Chapter 11
Debtor.)	
<hr style="border: 0.5px solid black;"/>		
)	
JOLENE E. WEE, PLAN TRUSTEE OF)	
UNIMEX CORPORATION,)	
)	
Plaintiff,)	
)	
)	
v.)	Adversary Proceeding No. 22-01058-BFK
)	
WEIWEI JIAN,)	
)	
Defendant.)	

MOTION TO CONTINUE TRIAL

COMES NOW Jolene E. Wee, the Plan Trustee (the “Trustee”) for Unimex Corporation, by and through her undersigned counsel, and files this motion to continue the trial scheduled for this action as set forth in the proposed order attached hereto as Exhibit "A", stating to the Court as follows:

1. On November 14, 2022, the Trustee filed a complaint (“Complaint”) against the Defendant to avoid transfers, recover property and for related relief. The Complaint seeks to avoid transfers of crypto and distributions to Mr. Jian on account of his equity interest in Unimex Corporation.

2. The pre-trial conference was held on September 11, 2023 and a two day trial was set for December 14, 2023 and December 15, 2023. Docket No. 40.

3. The Trustee is scheduled to be in Europe from December 11, 2023, to December 14, 2023, and will not be able to return to the United States in time to attend any of the trial.

4. The Trustee has spent significant time over the past two years and assisted counsel in the development of the factual elements of her claims. In addition, the Trustee desires to be present at the trial as the Plaintiff in this action and her role in pursuing avoidance actions for the benefit of the creditors of the Debtor. As the trial is more than two months away and exhibit and witness lists have not been exchanged, no party will be prejudiced by a continuance.

5. The Trustee submits that the Court should continue the trial to a date in early 2024 and the deadlines to exchange witness and exhibits lists and file objections thereto be extended accordingly.

6. On October 2, 2023, Counsel for the Trustee contacted Defendant's counsel to seek his consent or position on this Motion. As of the filing of the Motion, no response has been received.

7. No previous requests for continuance have been made regarding the trial date.

WHEREFORE, for all the foregoing reasons the Trustee respectfully requests that this Court enter an Order continuing the trial date and related deadlines and grant such further relief as it deems proper.

Respectfully submitted,

JOLENE E. WEE, PLAN TRUSTEE

By Counsel

NELSON MULLINS RILEY & SCARBOROUGH LLP
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Washington, DC 20001
Telephone: (202) 689-2800
Email: dylan.trache@nelsonmullins.com

By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Plan Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of October 2023, a copy of the foregoing Motion was delivered by CM/ECF to:

Maurice B. VerStandig
The Belmont Firm
1050 Connecticut Avenue, NW, Suite 500
Washington, DC 20036

/s/ Dylan G. Trache
Dylan G. Trache

EXHIBIT A

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JOLENE E. WEE, PLAN TRUSTEE OF)	
UNIMEX CORPORATION,)	
)	
Plaintiff,)	
)	
)	
v.)	Adversary Proceeding No. 22-01058-BFK
)	
WEIWEI JIAN,)	
)	
Defendant.)	

ORDER CONTINUING TRIAL

UPON CONSIDERATION of the motion for entry of an Order continuing the trial (“Motion”) filed by the Trustee; for good cause shown:

IT IS HEREBY ORDERED:

1. The trial is now continued to _____, 2024 at 9:30 a.m.
2. The parties shall file and exchange their final Witness Lists and Exhibits by _____, 202____.
3. Objections to the Exhibits, if any, must be filed by _____, 20____, at 5:00 P.M., otherwise the exhibits will stand as admitted into evidence.

4. The Clerk shall mail copies of this Order, or give electronic notice of its entry, to the parties listed below.

Dated: _____, 2023

United States Bankruptcy Judge

PREPARED BY:

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Washington, DC 20001
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Email: dylan.trache@nelsonmullins.com

By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to Jolene E. Wee, Plan Trustee

SEEN AND _____:

Maurice B. VerStandig, Va. Bar No. 81556
The Belmont Firm
1050 Connecticut Avenue, NW, Suite 500
Washington, DC 20036
Telephone: (202) 991-1101
Email: mac@dcbankruptcy.com

Counsel to the Defendant

CERTIFICATION PURSUANT TO LOCAL RULE 9022-1

I HEREBY CERTIFY that the foregoing order has been endorsed by or served upon all necessary parties.

Dylan G. Trache

LIST OF PARTIES TO RECEIVE NOTICE OF ENTRY
PURSUANT TO LOCAL RULE 9022-1

Dylan G. Trache
NELSON MULLINS RILEY & SCARBOROUGH LLP
101 Constitution Avenue, NW, Suite 900
Washington, DC 20001

Maurice B. VerStandig
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